

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

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JGIAP RH 160 LLC

Plaintiff,

Case No.:
1:21-cv-2489 (DG) (JRC)
**NOTICE OF MOTION
TO DISMISS COMPLAINT**

CRI HOLDING CORP., TOURAJ NAGHIEH,
MORALI AND ASSOCIATES, ANTHONY MORALI,
JOSEPH MORALI, MANDA INTERNATIONAL
CORPORATION, STRIKEFORCE MECHANICAL
CORPORATION, AND ANGELO CORRAO

Defendants.
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PLEASE TAKE NOTICE that upon the annexed Memorandum of Law and Declaration of Mark S. Friedlander, Esq., attorney for Defendants CRI HOLDING CORP., and TOURAJ NAGHIEH, will move this Court before Judge Diane Gujarati, U.S.D.J. at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201 on April 11, 2022 or such other date to be fixed by this Court, pursuant to Rule 12 (b) (6) of the Federal Rules of Civil Procedure, dismissing Plaintiff JGIAP RH 160 LLC'S Complaint.

Dated: April 11, 2022

Respectfully submitted,

/s/ Mark S. Friedlander

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